

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Midas Green Technologies, LLC,

Plaintiff,

- vs. -

Rhodium Enterprises, Inc.;

Rhodium Technologies LLC;

Rhodium 10mw LLC;

Rhodium 2.0 LLC;

Rhodium 30mw LLC;

Rhodium Encore LLC;

Rhodium Renewables LLC;

Rhodium Renewables Sub LLC;

Rhodium Ready Ventures LLC

Defendants.

Civil Action No. 6:22-cv-00050-ADA

Jury Trial Demanded

**JOINT MOTION TO ENTER
AGREED PROTECTIVE ORDER**

The parties respectfully request that the Court enter the proposed Protective Order attached as Exhibit A.

Dated: June 6, 2023

/s/ Melissa R. Smith

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Encore LLC, Rhodium Renewables LLC,
Rhodium Renewables Sub LLC; and
Rhodium Ready Ventures LLC

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

The undersigned certifies that, on June 2, 2023, he met and conferred with counsel for Defendants and Defendants agrees to the relief requested herein.

/s/ Michael C. Smith
Michael C. Smith

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on June 6, 2023. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Michael C. Smith
Michael C. Smith